



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

SUB F

DATE: July 11, 1984

TO: Phil Van Ness

FROM: Perry Mann *PM*

SUBJECT: LPC 11911501 - Madison County - Wood River/Amoco-River Front - ILD980503106
Technical Referral for Enforcement

The purpose of this is to request a referral of the subject facility for Enforcement Action concerning Subpart F violations.

The outstanding violations documented in the inspections conducted on September 22, 1983 and June 26, 1984, are as follows:

Class I: 725.190(a)
725.191

Class III: 725.192(d)
725.193(f)
725.194(a)(2)(A)
725.194(a)(2)(B)
725.194(a)(2)(C)

The Amoco-River Front property is part of the complex on which Amoco Oil Company refined petroleum products up until June 1, 1981. After this date, Amoco Chemical Company assumed "control" over the entire complex.

The River Front property is comprised of ponds #1 - #4, which Amoco has identified as the regulated units under Subpart F; ponds #5 - #8, which are known as the "Wastewater Surge Area"; and a landfill/impoundment, which was identified as the "Past Disposal Area" in the facility's Part A. Total area amounts to approximately 127 acres. The site is located immediately adjacent to the Mississippi River. The Impoundment Area (all except the Surge Pond Area) has been utilized for both the storage and disposal of hazardous and non-hazardous wastes including, but not limited to, spent filter clays, DAF float, water softener sludges, catalyst fines, API separator sludge, cinders, flyash; these practices were engaged in for some 35 year period.

The Subpart F Ground Water Monitoring Program as implemented is extremely inadequate. The four monitoring wells installed are not located or screened properly to determine what impact the facility is having or has had on the ground water. Information provided by the hydrogeologic study conducted by Woodward-Clyde for Amoco indicates that waste constituents are migrating from the facility. Samples collected by M. Dilday on 6/26/84 from two of the Subpart F wells exhibited hydrocarbon odors.

EPA Region 5 Records Ctr.



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EPA - D.L.C.
87-10-1-108

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The aforementioned apparent violations were cited in the Compliance Inquiry Letter dated May 30, 1984. Amoco responded in a letter dated June 5, 1984 and indicated that the Class I violations are due to "differences in judgement and interpretation of existing hydrogeologic conditions". Amoco also cited that the Class III violations have been corrected as per correspondence attached. This is incorrect.

The Subpart F issues are difficult to isolate from other outstanding Interim Status violations. Since June 1981, Amoco Oil's petroleum processing operations have been stopped. Hazardous wastes regulated under Subtitle G regulations were generated by the refinery processes, of which, some of these wastes are currently being stored on the Main Plant property. Amoco Chemical, while under the parent Amoco "umbrella" is a separate entity which seemingly has taken over the responsibilities under Interim Status from Amoco Oil for the subject facility. No Amoco Oil representative or office exists at the Wood River-River Front Site.

It would seem that prior to June 1981, Amoco Oil should have notified the Regional Administrator that the facility was going into closure, and removed wastes stored in the subject impoundment area. Instead, the wastes are still being stored and "managed" by Amoco Chemical, although no revisions to change the owner/operator on the Part A have been made, nor has data concerning the transfer of responsibility been made clear or formalized. The question of "abandonment" of this facility by Amoco Oil becomes both necessary and difficult to answer.

With particular regard to the "Past Disposal Area", the file indicates that in 1981 thru part of 1982 a slurry wall was put in around this area's boundaries and a cover cap was placed on top. These activities raise many questions concerning the "inactive" status which Amoco claims for this unit. If the placement of a slurry wall and cover cap can be considered as "significant management activities", then according to a recent federal guidance document, this disposal area would be considered an "active" regulated unit under Interim Status.

It is because the outstanding Subpart F violations were not resolved as per Amoco's June 5, 1984 reply to the CIL, and no compliance schedule proposed since that letter, that this request for the referral of violations for Enforcement Action is made. Amoco's letter requested that a meeting concerning the apparent outstanding violations be held in July. As per a phone conference with M. Haney on 7/6/84, he will be contacting Ed Sullivan of Amoco Oil concerning this request. The recent guidance given towards expediting enforcement activities vis-a-vis the nature of Amoco's CIL response makes the next course of action uncertain. It is requested that upon EDG's review that a decision be made as to the strategy of action to be taken, i.e. federal and/or state action, PECL, ENL, etc.

EDG - DLE G.
7/11/84

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Just recently, it has come to the Southern Region's attention that USEPA representatives conducted an investigation at the subject facility. It seems as though Region V is paying particular attention to both of Amoco's facilities that Subpart F is applicable. The motives for these inspections and their findings remain unknown at this time.

PCM:jlr

Attachments

cc: Bob Kuykendall
Tom Cavanagh
Gary King
Mark Haney ✓
Southern Region
Larry Eastep

EDM - DLRG.
STANLEY GILKIS